

ARCADIS  
30 West Monroe, Suite 1710  
Chicago  
Illinois 60603  
Tel 312.332.4937  
Fax 312.332.4434  
www.arcadis-us.com

Mr. Sam Borries  
On-Scene Coordinator  
USEPA Region 5  
77 West Jackson Boulevard (SE-5J)  
Chicago, IL 60604-3590

Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area Time-Critical Removal Action  
Monthly Report (December 2009)

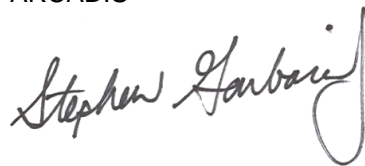
Dear Sam:

Attached is the 6<sup>th</sup> monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Paragraph 19a of the June 2009 Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action (Docket No. V-W-09-C-925). On August 5, 2009, the United States Environmental Protection Agency determined that future updates on the Former Plainwell Impoundment TCRA project will be included in this monthly report. Per the August 6, 2009 direction of the United States Environmental Protection Agency, monthly reports will only be submitted electronically.

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS



Stephen Garbaciak Jr., P.E.  
Vice President

Copies:

Leslie Kirby-Miles, USEPA  
Richard Karl, USEPA  
James Saric, USEPA  
Paul Bucholtz, MDEQ  
Jeff Keiser, CH2M HILL  
Kathy Huijbregtse, RMT Inc.  
Richard Gay, Weyerhaeuser Company

Martin Lebo, Weyerhaeuser Company  
J. Michael Davis, Esq., Georgia-Pacific LLC  
Paul Montney, P.E., Georgia-Pacific LLC  
L. Chase Fortenberry, P.G., Georgia-Pacific LLC  
Garry Griffith, P.E., Georgia-Pacific LLC  
Michael Erickson, P.E., ARCADIS

SEDIMENTS

Date:

January 15, 2009

Contact:

Steve Garbaciak

Phone:

312.332.4937 ext. 12

Email:

steve.garbaciak@  
arcadis-us.com

Our ref:

B0064536.0000.00014

**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/  
KALAMAZOO RIVER SUPERFUND SITE  
PLAINWELL NO. 2 DAM AREA TIME-CRITICAL REMOVAL ACTION**

**REPORT #6, DECEMBER 2009**

**PREPARED BY ARCADIS  
JANUARY 15, 2010  
ON BEHALF OF GEORGIA-PACIFIC LLC**

**SUBMITTED TO**

**SAM BORRIES, ON-SCENE COORDINATOR  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area TCRA**

**REPORT #6, DECEMBER 2009**

**Significant Developments and Activities During the Period**

- On December 1, United States Environmental Protection Agency (USEPA) hosted a general Site update public meeting in Plainwell.
- On December 4 and 22, ARCADIS and Georgia-Pacific submitted updated property access agreements detailing the revised locations of Staging Areas 1 and 2 to the owners of the Simons properties (Michelle and Paul Simons). The Simons accepted the December 22 agreement. A copy of the access agreement signature page was received via facsimile on December 22, and the original signed hard copy was received on December 29.
- On December 7, USEPA forwarded to ARCADIS a letter titled *Completion of Work Associated with the First Year of Construction at the Allied Paper/Kalamazoo River Superfund Site, Plainwell No. 2 Dam Time-Critical Removal Action* to document completion of the first year of construction activities. As stated in Paragraph 39c of the AOC, within 30 days of receipt of this letter Georgia-Pacific is required to submit a memorandum to support disbursement of special account funds.
- On December 7, ARCADIS and Georgia-Pacific requested from USEPA a 60-day extension for the submittal of the memorandum to support disbursement of special account funds in order to accommodate the invoice billing cycle and memo preparation timeframe. USEPA granted this request on December 8.
- On December 8, ARCADIS notified USEPA that the *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA* will be discontinued following submittal of the 16<sup>th</sup> installment until significant construction activities resume in the spring of 2010. USEPA approved the temporary suspension of report submittal.
- On December 9, 10, and 21, ARCADIS submitted to Weston (subcontractor to USEPA) copies of analytical data and chains-of-custody collected at the Plainwell No. 2 Dam Area TCRA.
- On December 9, ARCADIS submitted the 16<sup>th</sup> installment of the *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA* to USEPA and Michigan Department of Environmental Quality (MDEQ).
- On December 15, ARCADIS submitted to USEPA the 5<sup>th</sup> *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area TCRA* for November 2009.

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area TCRA**

**REPORT #6, DECEMBER 2009**

- On December 15, ARCADIS submitted to the owners of the Simons properties information regarding property owned by Michigan Department of Natural Resources (MDNR) adjacent to the Kalamazoo River.
- On December 16, MDEQ forwarded to ARCADIS a letter reminding ARCADIS to submit an annual self-monitoring letter by January 10, 2010, documenting water treatment at the Plainwell No. 2 Dam Area TCRA as required by Section C, Paragraph 3 of Substantive Requirements Document (SRD) MIU990028.
- On December 21, MDNR notified ARCADIS that the access roads located on MDNR-owned land are to be removed at the completion of construction activities.
- On December 23, ARCADIS and Georgia-Pacific LLC notified USEPA that they had reached an access agreement with the owner of the Simons properties.
- The status of property access agreements is summarized in Table A. Access to the McMurtrie property is pending.

**Data Collected and Field Activities Conducted During the Period**

- During the week of December 1, ARCADIS continued removal of equipment and material from Staging Area 3 and began clearing and grading Staging Area 1 and associated access roads. Aggregate material from Staging Area 3 was stockpiled for transfer to and use at Staging Area 1. Four soil samples (TS10049 to TS10052) were collected at 200-foot intervals from the access road to be installed from Douglas Avenue to Staging Area 1 and the Kalamazoo River.
- During the week of December 7, ARCADIS continued removal of equipment and material from Staging Area 3 and placed equipment at Staging Area 1. Aggregate material from Staging Area 3 was stockpiled for transfer to and use at Staging Area 1.
- During the week of December 14, ARCADIS completed removal of equipment and material from Staging Area 3, began the removal of marketable timber cut from the north side of the river, and began installation of access roads near Staging Area 1. Aggregate material from Staging Area 3 was stockpiled for transfer to and use at Staging Area 1.
- No work activities were performed and no samples were collected during the weeks of December 21 and 28.

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area TCRA**

**REPORT #6, DECEMBER 2009**

- As of December 31, approximately 4,700 cubic yards of material had been excavated from Removal Areas 1, 2, 3A, 4A, and 5A and Island 1. No excavation activities were performed in December. Excavation activities are scheduled to resume in spring 2010.
- The monthly Stakeholders Meeting was not conducted in December; as agreed upon at the November meeting, it will begin again when significant construction activities resume in the spring of 2010.

**Laboratory Data Received During the Period**

- No analytical data were received during the weeks of December 1, 14, or 21.
- During the week of December 7, ARCADIS received target compound list (TCL) volatile organic compounds (VOCs), TCL semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), TCL pesticides, total organic carbon (TOC), Resource Conservation and Recovery Act (RCRA) metal, pH, and total organic carbon data for topsoil sample TS10048 from TestAmerica Laboratories, Inc. (TAL).
- During the week of December 28, ARCADIS received gradation and grain size geotechnical data for topsoil sample TS10048 from TAL.
- ARCADIS is awaiting analytical data for pre-construction soil samples TS10049 through TS10052.

**Issues Encountered and Actions Taken**

- ARCADIS and Georgia-Pacific met with the owners of the Simons properties on several occasions in December to discuss access issues, specifically regarding the locations of Staging Areas 1 and 2. Revised access agreements were submitted to the owners of the Simons properties on December 4 and 22. The Simons signed the most recent version of the access agreement on December 22.
- The owner of the McMurtrie property (Mr. McMurtrie) stated that he would not sign the access agreement if the proposed location of Staging Area 2 was not moved away from his property line because he is concerned it will interfere with daily activities on his property, which is currently used as a horse training facility. The proposed location for Staging Area 2 is located on the Simons properties adjacent to the McMurtrie property. As a part of the access agreement executed with the owners of the Simons property, the location of Staging Area 2 was moved away from the McMurtrie property. On December 29, ARCADIS met with Mr. McMurtrie to discuss the revised location of Staging Area 2. Mr. McMurtrie also received a revised property access agreement and will review it in January. ARCADIS will continue to negotiate with Mr. McMurtrie throughout January.

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area TCRA**

**REPORT #6, DECEMBER 2009**

**Developments Anticipated During the Next Reporting Period**

- During the week of January 4, ARCADIS is scheduled to submit to MDEQ a summary of water treatment performed in 2009 to satisfy the requirement in Section C, Paragraph 3 of SRD MIU990028.
- Throughout January, ARCADIS is tentatively scheduled to complete the removal of marketable timber cut from the north side of the river, begin the removal of access roads on the north side of the river (for use in the construction of access roads on the south side of the river), continue the construction of Staging Area 1, continue clearing and grubbing access roads, and continue installing access roads on the south side of the river.
- In January, ARCADIS will continue submitting copies of analytical data from Plainwell No. 2 Dam Area TCRA sampling activities to USEPA.
- In January, ARCADIS anticipates completing negotiations with the property owner (McMurtrie) for the remaining access agreement.

**Updates to the Former Plainwell Impoundment TCRA**

- On December 10, ARCADIS and USEPA discussed the timetable for receiving finalized comments on the Final Construction Completion Report (CCR).
- On December 22, USEPA forwarded to ARCADIS a letter presenting the final comments from USEPA on the CCR. Comments received by USEPA from MDEQ, National Oceanic and Atmospheric Association, MDNR, and United States Fish and Wildlife Service were included in this transmittal.

**Developments Anticipated During the Next Reporting Period from the Former Plainwell Impoundment TCRA**

- ARCADIS is scheduled to submit a response to the December 22 USEPA comment letter and a revised CCR to USEPA in January.

**Georgia-Pacific, LLC**  
**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**  
**Plainwell No. 2 Dam Area TCRA**  
**Monthly Report #6, December 2009**

**Table A — Summary of Property Access Agreements (as of December 31, 2009)**

<b>Date Sent</b>	<b>Property Owner</b>	<b>Parcel Number</b>	<b>Status</b>
6/10/2009 revised 11/18/09	Arcan Inc. (Farrell)	08-032-010-00	accepted (original received 6/18/09, revised received 11/19/09)
5/22/2009	Consumers Energy	08-032-015-00	accepted (received 10/07/09)
7/31/2009	Diana Steele Thompson	08-032-005-10	accepted (received 8/4/09)
5/22/2009	Edward and Ronald Hodgman	08-032-027-00	accepted (received 6/3/09)
5/22/2009 revised 12/29/09	Edward Mc Murtrie	08-032-042-00 08-032-044-00	in negotiations
5/22/2009	Howe Aluminum Products	08-032-028-00	accepted (received 6/3/09)
7/31/2009	MDNR	08-032-041-00 08-032-040-00	accepted (received 8/7/09)
5/22/2009 revised 11/20/09, 12/04/09, and 12/22/09	Michelle and Paul Simons	08-032-034-10 08-032-039-00 08-032-006-00	accepted (received 12/22/09)
7/27/2009	Steele Trust	08-033-012-00 08-033-009-00 08-033-018-00	accepted (received 8/3/09)
8/4/2009	Ray Hendricksma	08-032-033-00	accepted (received 8/7/09)
	Terry Winkle		accepted (received 8/10/09)

**Georgia-Pacific LLC**  
**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**  
**Plainwell No. 2 Dam Area TCRA**  
**Monthly Report #6, December 2009**

**Table B — Summary of Samples Collected and Data Received in December 2009**

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action/Notes
<b>Fill Material Sampling</b>									
TS10048	10/22/09	11.05.09 (KAR) / 12.07.09 (KAR) / 12.29.09 (TAL)	094214 (KAR) / KAL482 (KAR) / KAL 506 (TAL)	KAR Labs and TAL	9-part composite sample from topsoil	PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL Pesticides, gradation, total organic carbon, grain size, and pH (TAL) DROs and GROs (KAR)	0.067 mg/kg U	4 mg/kg	None <sup>1</sup>
<b>Property Access Soil Samples</b>									
TS10049	12/03/09	NR	NR	NR	Access road on Farrell property (Douglas Avenue to SA 1 to River)	PCBs	-	-	-
TS10050					Access road on Farrell property (Douglas Avenue to SA 1 to River)	PCBs	-	-	-
TS10051					Access road on Farrell property (Douglas Avenue to SA 1 to River)	PCBs	-	-	-
TS10052					Access road on Farrell property (Douglas Avenue to SA 1 to River)	PCBs	-	-	-

**Notes:**

1 - Analytical results compared to applicable Part 201 cleanup criteria and Part 213 RBSLs provided in MDEQ's RRD Operational Memorandum No. 1 (Table 2, Column #19, Direct Contact Criteria & RBSLs).

\* Analytical results have not been validated.

DRO - diesel range organic

GRO - gasoline range organic

mg/kg - milligrams per kilogram

MDEQ - Michigan Department of Environmental Quality

NR - Not Received

PCBs - polychlorinated biphenyls

RBSL - Risk Based Screening Level

RCRA - Resource Conservation and Recovery Act

RRD - Remediation Redevelopment Division

SA - Staging Area

SVOCs - semi volatile organic compounds

TAL - TestAmerica Laboratories

TCL - target compound list

U - Compound analyzed but not detected at a concentration above the reporting limit

VOCs - volatile organic compounds